

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CASE NO. 03-CR-10356-MLW

UNITED STATES

VS.

FREDERICK A. SIMONE,  
a/k/a FREDDY, a/k/a  
THE NEIGHBOR,

VINCENT C. GIOCCHINI,  
a/k/a DEE DEE; and

FRANCIS WHITE, a/k/a  
THE WHITE-HAIRED GUY

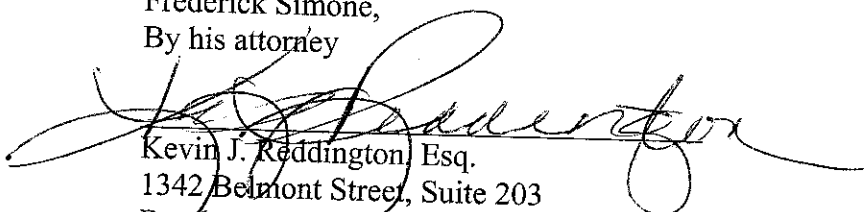
**ASSENTED TO MOTION FOR EXTENSION OF TIME FOR FILING OF  
DISCOVERY MOTIONS**

Now come the defendants in the above numbered indictment and move this Court for an extension of time for a period of sixty (60) days for the filing of discovery motions late.

In support of the within motion defense counsel note that due to the press of trial matters the defendants' counsel have not submitted the requisite discovery motions. Further, counsel yesterday received volumes of transcripts from the government but for obvious reasons have not reviewed said transcripts and therefore the defendants respectfully move this Court for a sixty day extension to file discovery motions in accordance with Federal Rules of Criminal Procedure 16A(1) as well as Local Rules 116.1, et. seq.

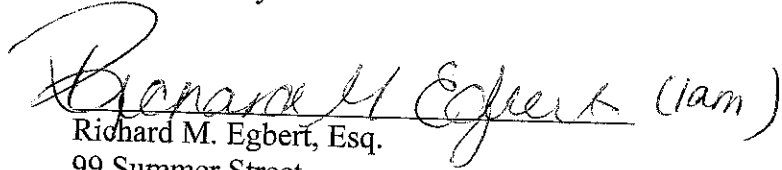
This motion has been assented to by Assistant United States Attorney Colin Owyang.

Frederick Simone,  
By his attorney



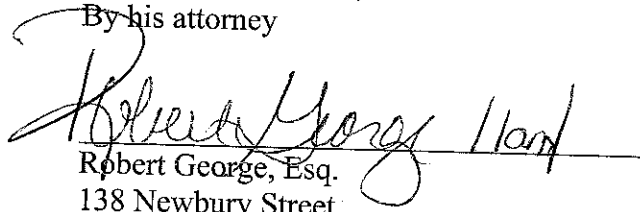
Kevin J. Reddington, Esq.  
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Brockton, Massachusetts 02301  
(508) 583-4280

Francis White,  
By his attorney

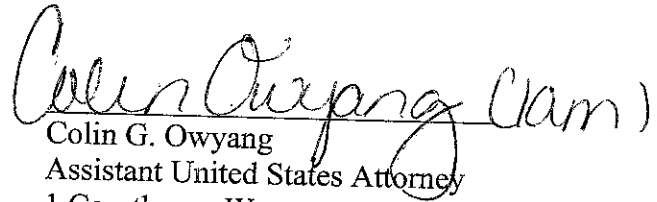


Richard M. Egbert, Esq.  
99 Summer Street  
Boston, MA 02110  
(617) 737-8222

Vincent C. Giocchini,  
By his attorney



Robert George, Esq.  
138 Newbury Street  
Boston, MA 02116  
(617) 262-6900

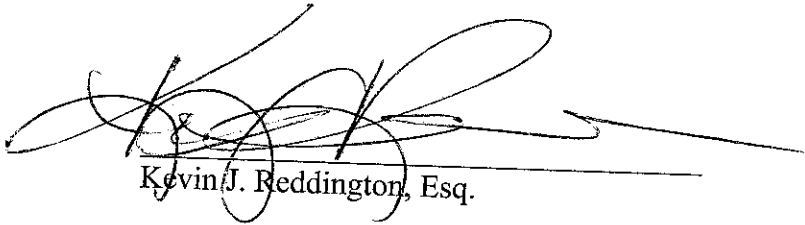


Colin G. Owyang  
Assistant United States Attorney  
1 Courthouse Way  
Boston, MA 02110  
(617) 748-3100

**CERTIFICATE OF SERVICE**

I, Kevin J. Reddington, Esq., Attorney for the Defendant, Frederick Simone, hereby certify that I have forwarded a copy of the within Assented to Motion for Extension of Time for Filing of Discovery Motions, this date, via fax transmission and regular mail, to;

Colin G. Owyang  
Assistant United States Attorney  
1 Courthouse Way  
Boston, MA 02110



Kevin J. Reddington, Esq.

DATED: April 22, 2004